



# Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality  
Northwest Region Portland Office  
2020 SW 4<sup>th</sup> Avenue, Suite 400  
Portland, OR 97201-4987  
(503) 229-5263  
FAX (503) 229-6945  
TTY (503) 229-5471

August 1, 2003

Tara Martich  
EPA, Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Re: Linnton Plywood Association Facility  
10504 NW St Helens Road, Portland OR  
ECSI No. 2351 ~~2~~ **2373**

Dear Tara:

The Oregon Department of Environmental Quality (DEQ) reviewed both historic and recent site information regarding the environmental conditions at the Linnton Plywood Association (LPA) facility in Portland. Based on our review, the Department concluded that the upland portion of the site has been adequately investigated, two small independent removals have been successfully completed, and the site is not a current source of contamination to Portland Harbor. DEQ therefore recommends that no additional source control actions are required at the site.

Please review the brief summary presented in the remainder of today's letter and Don Pettit's (DEQ project manager for LPA) attached July 31, 2003 memo titled "Staff Report for Completion of Pre-Remedial Investigation (Pre-RI)". Please complete your review and provide comments within 30-days of your receipt of today's letter. DEQ will consider all comments received prior to finalizing our decision regarding the site. DEQ expects that EPA will review and comment on our determination that the site is not a current source of Portland Harbor contamination. There are some outstanding environmental concerns at the LPA site that do not pose a threat to the river, but that must be resolved before DEQ proposes a "No Further Action" determination for the upland portion of this site.

## Rationale for Source Control Decision

LPA completed a Pre-RI accomplishing the following objectives:

- Identify and characterize all upland hazardous substance source areas at the facility,
- Evaluate all contaminant migration pathways at the facility,
- Determine the nature, extent, and distribution of hazardous substances in affected media at the facility; and
- Identify all current and reasonably likely future human and ecological receptors at the facility.

After characterizing the facility, LPA conducted two small source area removals at Outfall 5 and the knife grinding debris pile. Approximately 10 cubic yards (cy) of contaminated soil/sediment were removed from the uplands at Outfall 5, and 8 cy of debris and soil were

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removed from the knife grinding pile. Confirmation samples collected after the removals indicate the areas do not pose a threat to the river.

With the completion of the Pre-RI and the two small removals, DEQ does not consider the site to be a current threat to the river.

If EPA wishes to review any of the background documents related to this project, please contact me and I'll send them to you. The most important project background documents are listed on page 10 of Don's attached 7/31/03 memo.

If you have any questions regarding today's letter or any other issues, please contact me at (503) 229-6825 or [anderson.jim@deq.state.or.us](mailto:anderson.jim@deq.state.or.us)

Sincerely,



James M. Anderson  
Cleanup & Portland Harbor

Attachments: Attachment 1 - Don Pettit's July 31, 2003 memo titled "Staff Report for Completion of Pre-Remedial Investigation"

cc: Don Pettit, C/ER, DEQ  
Mike Rosen, C/PH, DEQ  
Fenix Grange, C/PH, DEQ